

EPA Jacket

71368-61

Vols. 2 and 3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

DEC 1 2006

Mr. George Meindl
Registration Manager
Nufarm Americas, Inc.
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527

Dear Mr. Meindl:

Subject: Revised Basic Confidential Statement of Formula
Imidacloprid Technical
EPA Registration No. 71368-61

The confidential statement of formula (CSF) dated August 4, 2006, for the basic formulation has been reviewed and is acceptable. This CSF replaces all previous versions. If you have any questions, please contact me at (703)-308-8045.

Sincerely yours,

A handwritten signature in black ink that reads "Venus Eagle".

Venus Eagle
Insecticide-Rodenticide Branch
Registration Division (7505P)

DATE: 11/27/06

SUBJECT: Product Chemistry Review of IMIDACLOPRID TECHNICAL

FROM: Indira Gairola
Product Chemistry Team
Technical Review Branch/RD (7505P)

SJBW 11/29/06

TO: Venus Eagle / Dani Daniel PM 01
Insecticide-Rodenticide Branch/RD (7505P)

DP BARCODE No.: 332230

File Symbol No.: 71368-61

COMPANY: NUFARM, INC.

PCC: 129099

Decision No. 370028

Chemical Name: (IUPAC, ANSI, etc.) Imidacloprid

CAS No. 138261-41-3

USE: Insecticide

INTRODUCTION:

NUFARM, INC. has submitted Product Chemistry Guideline reference 830 Subgroup A data to support the amendment to registration of IMIDACLOPRID TECHNICAL.

SUMMARY OF FINDINGS:

1. NUFARM, INC. has submitted MRID#s 469155-01 for Product Chemistry data to support amendment to the registration of IMIDACLOPRID TECHNICAL.
The submitted package was reviewed and details of product chemistry data will be discussed in the following Pages:
2. The Basic Formulation CSF dated 08/04/06 is filled out completely and correctly.
The certified limits are in compliance with 40 CFR 158.175 (b) (2).
3. Applicant is reporting an increase in the impurity previously reported as [REDACTED] to an increase of [REDACTED].
4. None of the impurities reported are of toxicological concern.
5. The amended Basic Formulation CSF dated 08/04/06 reflects the aforementioned change is acceptable.

CONCLUSIONS:

TRB has reviewed the product chemistry data submitted for the above mentioned subject product and has concluded that:

1. Product Chemistry data requirements for subgroup A & B were reviewed and accepted previously.
2. Certified limits are in compliance with 40CFR.175 (b) (2). See CONFIDENTIAL APPENDIX.
3. The amended Basic Formulation CSF dated 08/04/06 is acceptable

MANUFACTURING PROCESS (830.1620):

For details please refer to the CONFIDENTIAL APPENDIX.

DISCUSSION OF FORMATION OF IMPURITIES (830.1670):

This portion will be discussed in CONFIDENTIAL APPENDIX

CERTIFIED LIMITS

Please refer to the CONFIDENTIAL APPENDIX for CSF.

APPENDIX 1

**Confidential Statement of Formula for
Imidacloprid Technical
(Proposed Revision)**

APPENDIX 2

Tabulation of analytical values for impurities:

Analyses of Pilot Scale-up of Imidacloprid (264 Assays)



468165-00

Nufarm Americas, Inc.
George Meindl
Registration Manager
150 Harvester Drive Suite 200
Burr Ridge, IL 60527
Phone: 630.455.2017 Fax: 630.455.2030
george.meindl@us.nufarm.com

August 17, 2006

Via Overnight Courier

Venus Eagle (PM-1)
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Subject: Imidacloprid Technical
EPA Reg. No. 71368-61
Amendment to existing registration
Non- fast track request R34 (89)

Dear Ms. Eagle:

During the manufacturing scale-up of the subject product it was discovered that the specifications declared from the previously submitted product chemistry need to be alerted slightly. A process impurity that appeared in the previously submitted chromatograms at levels of [REDACTED] and thus not reported per the guidelines is now showing up at levels of slightly [REDACTED]. Therefore we would like to revise the confidential statement of formula to reflect this change. The upper certified limits proposed take into consideration the ingredient in the product when good manufacturing practices and normal quality control procedures are used.

Note that no new impurities are present from the original submission and none of the impurities are of toxicological concern.

Under the Pesticide Registration Improvement Act of 2003, it is our opinion that this action falls under category R34 89, amendments/non-fast track. We believe this is the appropriate category since this application request is to amend an existing registration that includes reviewing product chemistry data. Therefore Nufarm anticipates this action requires a fee of \$3150 and we would anticipate a four-month review time.

To process this request please find enclosed the following:

- Application for Pesticide Registration (EPA form 8570-1)
- Confidential Statement of Formula (EPA Form 8570-5)



Nufarm Americas, Inc.
George Meindl
Registration Manager
150 Harvester Drive Suite 200
Burr Ridge, IL 60527
Phone: 630.455.2017 Fax: 630.455.2030
george.meindl@us.nufarm.com

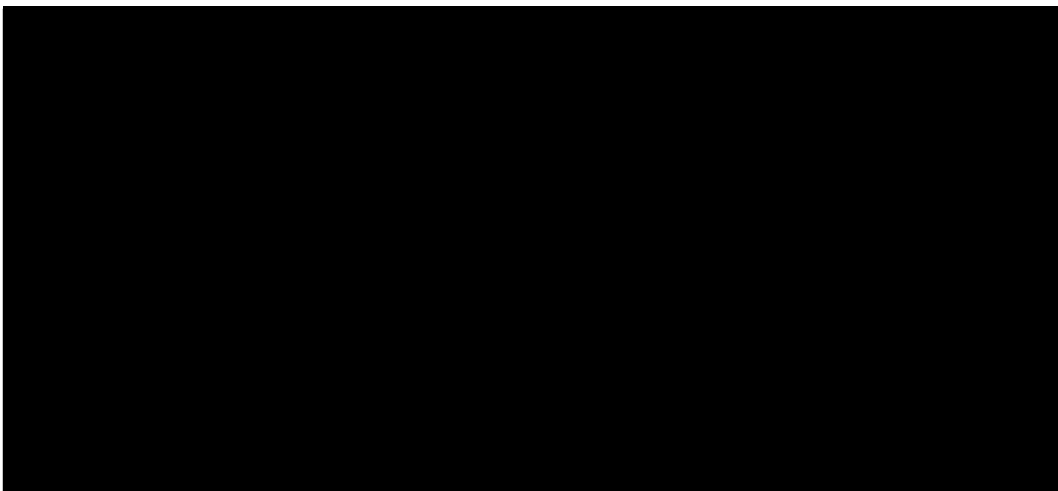
46815501 • Product Chemistry (OPPTS Guideline Series 830.1750) Report
titled: Imidacloprid Technical Specifications - Document No. RTP-
06-041-REG (3 copies)

If you should have any questions regarding this matter, please feel free to
contact me at 630.455.2017 or email at george.meindl@us.nufarm.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'George Meindl', written over a horizontal line.

George Meindl
Registration Manager
Nufarm Americas, Inc.



1V CERTIFIED LIMITS

830.1750 Certification of Limits:

1. The Basic Formulation CSF dated 05/26/06 is filled out completely and correctly.
The certified limits are in compliance with 40 CFR158 .175 (b) (2).

Please refer to the copy of attachment (CSF) dated 08/04/06



Nufarm Americas, Inc.
George Meindl
Registration Manager
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527
Phone: 630.455.2017 Fax: 630.455.2030
george.meindl@us.nufarm.com

June 20, 2006

Via Overnight Courier

Dani Daniel (PM-1)
Document Processing Desk (FIN LABEL)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room 84900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Subject: Imidacloprid Technical
EPA Reg. No. 71368-61
Final Printed label

Dear Ms Daniel:

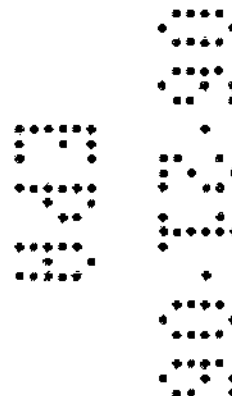
Enclosed are the subject product's final print labeling, which is now consistent with the EPA comment letter and EPA stamped label dated 4/20/2006. To process this request please find enclosed the following:

- Application for Pesticide Registration (EPA form 8570-1)
- Final print labeling (2 copies)

If you should have any questions regarding this matter, please feel free to contact me at 630.455.2017 or email at george.meindl@us.nufarm.com.

Sincerely,

George Meindl
Registration Manager
Nufarm Inc.





Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

	United States Environmental Protection Agency Washington, DC 20480	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide - Section I

1. Company/Product Number 71368-61	2. EPA Product Manager Dan Kenny	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Imidacloprid Technical	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Nufarm Inc. 150 Harvester Drive Suite 200 Burr Ridge, IL 60527 <input checked="" type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(ii), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section - II

<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated 4/20/2006 <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below.
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Explanation: Use additional pages if necessary. (For section I and Section II.)

NOT REVIEWED
 In Accordance with PR Notice 82-2
 Based on Draft Labeling Dated
APR 20 2006

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No			
* Certification must be submitted		If "Yes" Unit Packaging wgt. _____ No. per container _____	If "Yes" Package wgt. _____ No. per container _____	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Other _____ <input type="checkbox"/> Stenciled					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name George Meindl george.meindl@us.nufarm.com	Title Registration Manager	Telephone No. (Include Area Code) 630.455.2017
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		
2. Signature 	3. Title Registration Manager	8. Date Application Received (Stamped)
4. Typed Name George Meindl	5. Date 6/20/2006	

NOT REVIEWED
In Accordance with PR Notice 82-2
Based on Draft Labeling Dated

IMIDACLOPRID APR 20 2006

TECHNICAL

ACTIVE INGREDIENT:		
Imidacloprid, 1-[(6-chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine	98%	
OTHER INGREDIENTS:	2%	
TOTAL:	100%	

KEEP OUT OF REACH OF CHILDREN
WARNING

For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300
For Medical Emergencies Only, Call (877) 325-1840

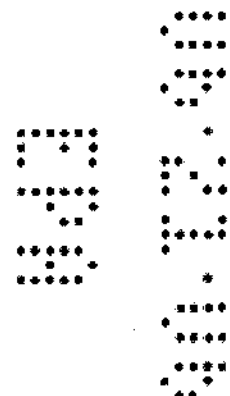
EPA REG. NO. 71368-61
EPA EST. NO.

MANUFACTURED BY
NUFARM INC.
BURR RIDGE, IL 60527



NET CONTENTS

071368-00051.20060510.



**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS & DOMESTIC ANIMALS
WARNING**

May be fatal if swallowed. Do not breathe dust or vapor. Do not get in eyes, on skin or on clothing. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco products. Remove contaminated clothing and wash before reuse.

FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF INHALED	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
IF IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-325-1840 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat symptomatically.	

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates. Keep out of lakes, streams, or ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public water unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is for manufacturing use only and is intended for formulation into end use products for:

Terrestrial Non-food Crop, or Residential and Commercial Outdoor: Lawns, turfgrasses, ornamentals.

Terrestrial Food Crop: Apple, Banana, Barley, Blueberry, Bushberry, Canola, Citrus, Cotton, Cranberry, Cucurbit Vegetables, Grape, Greenhouse Vegetables, Fruiting Vegetables, Head and Stem Brassica Vegetables, Leafy vegetables, Leafy Petiole vegetables, Legume vegetables, Hop, Pecan, Pome fruit, Potato, Root vegetables, edible seed crops for Sorghum, Sugarbeet, Strawberry, Stone Fruit, Sunflower, Tropical Fruit, Tuberos and Corm Vegetables, and Wheat.

Greenhouse Non-food Crop or Residential and Commercial Indoor: Ornamentals.

All other uses for which the USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.

Uses for experimental purposes that are in compliance with EPA requirements.

Detailed information on chemical and physical properties and other formulating recommendations for this product are available upon request from Nufarm Americas Inc. Obtain and read this information before undertaking the formulation of Imidacloprid Technical in order to avoid formulation hazards and insure a satisfactory finished product.

Labeling for products formulated from this product must conform to that which is currently registered with the U.S. Environmental Protection Agency. For specific information on federally registered uses, contact Nufarm Americas Inc.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Handle and open container in a manner as to prevent spillage. If the container is leaking or material is spilled for any reason or cause, carefully sweep material into a pile and dispose of as directed for pesticides below.

Refer to Precautionary Statements on label for hazards associated with the handling of this material. In spill or leak incidents, keep unauthorized people away. You may contact Chemtrec (800) 424-9300.

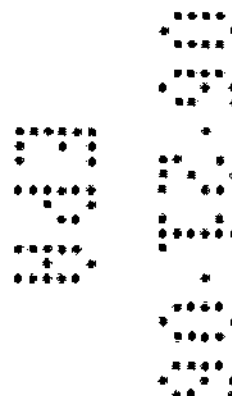
PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, or residue is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative of the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Do not use container in connection with food, feed, or drinking water. Completely empty container into the processing equipment. Then dispose of empty container in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

WARRANTY STATEMENT

NUFARM INC. warrants that the product conforms to the chemical description on the label and is reasonably fit for the purposes set forth on the label when used according to directions under normal use conditions. THERE ARE NO OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING A WARRANTY OF FITNESS FOR A PARTICULAR PURPOSE. This warranty does not extend to the handling or use of this product contrary to label instructions or under abnormal conditions or under conditions not reasonably foreseeable to seller and buyer assumes all risk of any such use.

{RV042006}





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF PREVENTION,
PESTICIDES AND
TOXIC SUBSTANCES

October 4, 2008

I, Venus Eagle, Insecticide/Rodenticide Branch, Registration Division, Office of Pesticide Programs, Office of Prevention, Pesticides and Toxic Substances, United States Environmental Protection Agency ("EPA"), certify that the pesticide product (s) listed below is, as of the date of this letter, a registered product under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, and that as such, the product(s) may be sold and marketed in the United States of America as authorized and limited by FIFRA. A true and correct copy of the product label approved by EPA is attached to accompany this letter.

Registration of this product(s) with EPA also denotes that the registrant listed below is responsible for ensuring full compliance with all the laws of the United States of America, or governing jurisdiction, regarding the sale, storage and/or disposal of the product(s). Further, the recipient of this letter is on notice that the referenced registration and/or the accompanying label may change subsequent to the date of this letter. EPA assumes no responsibility to notify the recipient(s) (i.e., Jamaica) of this letter of any change in the status of the registration(s) and/or the product label for the product(s) listed below.

EPA has issued registration numbers for the product(s) listed below to:

Nufarm, Inc.
150 Harvester Drive Suite 200
Burr Ridge, IL 60527

EPA Registration Number: 71368-81
Name of Product: IMIDACLOPRID TECHNICAL

Venus Eagle

Venus Eagle
Risk Manager 01
Insecticide/Rodenticide Branch
Registration Division (7508P)





Nufarm Americas Inc.
Jeannie K. Smith
Vice President
Registrations & Regulatory Affairs
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527
Phone: 630 455-2018
jeannie.smith@us.nufarm.com

September 11, 2006

via overnight courier

Document Processing Desk
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S4900 One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Attention: **Ms. Betty Williams**
Insecticide-Rodenticide Branch

Subject: Gold Seal Certificates

Please forward to my attention one (1) gold seal certificate on EPA letterhead stating that the following Nufarm label is registered with the EPA. We intend to use this certificate in Jamaica.

Product Name
Imidacloprid Technical

EPA Reg. No.
71368-61

Send the certificate to my attention at:

Jeannie Smith
Nufarm Americas Inc.
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527 USA

Should you have any questions, please telephone me at 630 455-2018.

Thank you,

A handwritten signature in black ink that reads "Jeannie Smith". The signature is written in a cursive, flowing style.

Jeannie Smith
Vice President

Material to be added to a Mini-Jacket
(in the case where an e-Jacket exists)

Reg. No. 71368-61

Send to SIG: check box ☐

This material is:

- ☐ New stamped-accepted label
- ☐ New CSF
- ☐ Notification
- ☐ Final Printed Label

☒ Other: Filed Gold Seal

Instructions: Attach this notice on top of the material. It must be clipped all together and there should be NO STAPLES in the material. Then give the material with this coversheet to staff in the Information Services Center (Room 230).

Reviewer's Name: Betty R. Williams

Phone: 308-0132 Division: RD/IRB

Date: 6-14-06



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF PREVENTION,
PESTICIDES AND
TOXIC SUBSTANCES

June 6, 2006

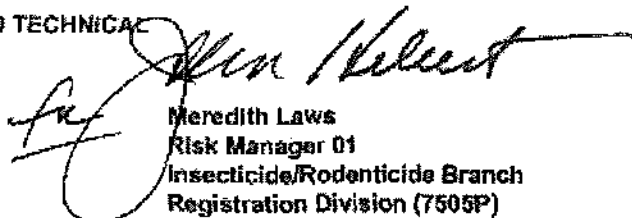
I, Meredith Laws, Insecticide/Rodenticide Branch, Registration Division, Office of Pesticide Programs, Office of Prevention, Pesticides and Toxic Substances, United States Environmental Protection Agency ("EPA"), certify that the pesticide product (s) listed below is, as of the date of this letter, a registered product under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, and that as such, the product(s) may be sold and marketed in the United States of America as authorized and limited by FIFRA. A true and correct copy of the product label approved by EPA is attached to accompany this letter.

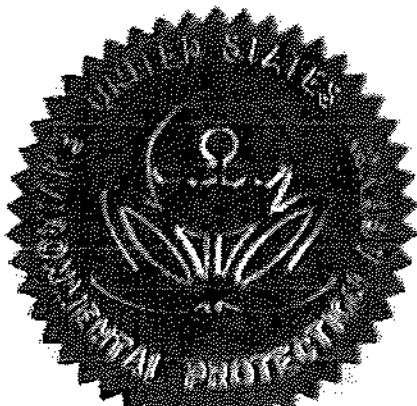
Registration of this product(s) with EPA also denotes that the registrant listed below is responsible for ensuring full compliance with all the laws of the United States of America, or governing jurisdiction, regarding the sale, storage and/or disposal of the product(s). Further, the recipient of this letter is on notice that the referenced registration and/or the accompanying label may change subsequent to the date of this letter. EPA assumes no responsibility to notify the recipient(s) (i.e., Greece, Italy, Mexico, Morocco, Serbia) of this letter of any change in the status of the registration(s) and/or the product label for the product(s) listed below.

EPA has issued registration numbers for the product(s) listed below to:

Nufarm, Inc.
150 Harvester Drive Suite 200
Burr Ridge, IL 60527

EPA Registration Number: 71388-61
Name of Product: IMIDACLOPRID TECHNICAL


Meredith Laws
Risk Manager 01
Insecticide/Rodenticide Branch
Registration Division (7505P)





Nufarm Americas Inc.
Jeannie K. Smith
Vice President
Registrations & Regulatory Affairs
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527
Phone: 630-455-2018
jeannie.smith@us.nufarm.com

May 8, 2006

via overnight courier

Document Processing Desk
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S4900 One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Attention: ~~Mr. Dan Kenny, PM-01~~
Insecticide-Rodenticide Branch

Subject: Gold Seal Certificates

Please forward to my attention five (5) gold seal certificates on EPA letterhead stating that the following Nufarm label is registered with the EPA. We intend to use these certificates in Serbia, Morocco, Italy, Mexico and Greece.

Product Name
Imidacloprid Technical

EPA Reg. No.
71368-61

Send the certificates to my attention at:

Jeannie Smith
Nufarm Americas Inc.
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527 USA

Should you have any questions, please telephone me at 630 455-2018.

Thank you,

A handwritten signature in cursive script that reads "Jeannie Smith".

Jeannie Smith
Vice President



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF PREVENTION,
PESTICIDES AND
TOXIC SUBSTANCES

June 6, 2006

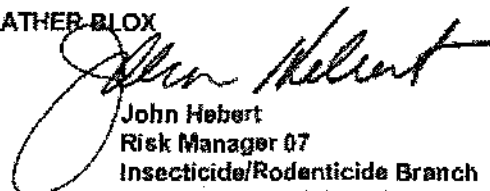
I, John Hebert, Insecticide/Rodenticide Branch, Registration Division, Office of Pesticide Programs, Office of Prevention, Pesticides and Toxic Substances, United States Environmental Protection Agency ("EPA"), certify that the pesticide product(s) listed below is, as of the date of this letter, a registered product under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, and that as such, the product(s) may be sold and marketed in the United States of America as authorized and limited by FIFRA. A true and correct copy of the product label approved by EPA is attached to accompany this letter.

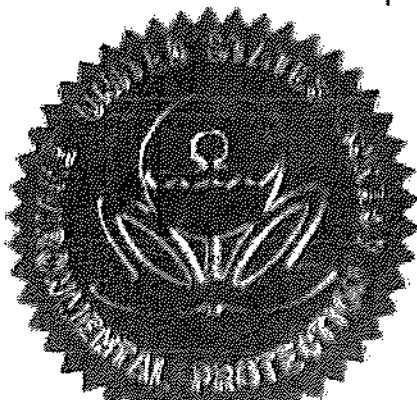
Registration of this product(s) with EPA also denotes that the registrant listed below is responsible for ensuring full compliance with all the laws of the United States of America, or governing jurisdiction, regarding the sale, storage and/or disposal of the product(s). Further, the recipient of this letter is on notice that the referenced registration and/or the accompanying label may change subsequent to the date of this letter. EPA assumes no responsibility to notify the recipient(s) (i.e., Jordan) of this letter of any change in the status of the registration(s) and/or the product label for the product(s) listed below.

EPA has issued registration numbers for the product(s) listed below to:

Bell Laboratories Inc
3899 Kinsman Blvd
Madison, WI 53704

EPA Registration Number: 12455-79
Name of Product: CONTRAC ALL-WEATHER-BLOX


John Hebert
Risk Manager 07
Insecticide/Rodenticide Branch
Registration Division (7505P)





3699 KINSMAN BLVD
MADISON, WI 53704 USA
608 241 9572
FAX: 608 241 9651
www.belllabs.com

May 24, 2006

Betty Williams
US EPA
Washington, DC 20460
williams.bettyr@epa.gov

RE: Gold Seal Letters

Dear Ms. Williams,

On behalf of Bell Laboratories Inc., I would like to request the following Gold Seal Letters. The letters may be sent to my attention at the address listed below.

Product Name	Registration number	Destination Country	Quantity	Purpose
Contrac All-Weather Blox	12455-79	Jordan	1	New registration

John
Imagino

Sincerely,

Bell Laboratories, Inc.

Torill Holm
International Registration Specialist
3699 Kinsman Blvd
Madison, WI 53704
tel: 608.241.0202 x3085
fax: 608.244.1056
tholm@belllabs.com

Material to be added to a Mini-Jacket (in the case where an e-Jacket exists)

Reg. No. 71368-61

Instructions: Attach this notice on top of the material. It must be clipped all together and there should be NO STAPLES in the material. Then give the material with this coversheet to staff in the Information Services Center (Room 230).

Reviewer's Name: Sami Samir

Phone: 703 368 5409 Division: RD

Date: 4/20/06



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Registration Division (H7505C)
401 "M" St., S.W.
Washington, D.C. 20460

EPA Reg.
Number:

71368-61

Date of Issuance:

Term of Issuance: Conditional

Name of Pesticide Product:

Imidacloprid Technical

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Mr. George Meindl
Nufarm Americas, Inc.
1333 Burr Ridge Parkway, Suite 125A
Burr Ridge, IL 60527

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A). Once a pesticide is registered, however, it is not regarded as permanently acceptable. Registration does not eliminate the need for continual reassessment of pesticides. If the Agency determines that, at any time, additional data are required to maintain in effect an existing registration, the Agency will require submission of such data under FIFRA section (3)(c)(2)(B).

1. Revise the EPA Registration Number to read, "EPA Reg. No. 71368-61".

Signature of Approving Official:

Dani Daniel
Insecticide-Rodenticide Branch
Registration Division (7505C)

Date:

APR 20 2006

Page Two
71368-61

2. Remove from the "Terrestrial Food Crop" section of the label-- prune garden beet, roots and tops. Those commodities uses are only added to the label through Section 18.
3. Submit to the Agency a one year storage stability and corrosion characteristics study. The observations must be made at 0, 3, 6, 9, and 12 months intervals.
4. Submit two copies of your final printed labeling before you release the product for shipment.

A stamped copy of the label is enclosed for your records. If you have any questions regarding this notice, please contact me at (703) 305-5409.

Enclosure:

Imidacloprid Technical

ACTIVE INGREDIENT:

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine . . . 98%

OTHER INGREDIENTS: 2%

TOTAL 100%

EPA Reg. No. 71368-

EPA Est. No.

KEEP OUT OF REACH OF CHILDREN WARNING

FIRST AID

IF SWALLOWED

Call a poison control center or doctor immediately for treatment advice.

Have person sip a glass of water if able to swallow.

Do not induce vomiting unless told to do so by the poison control center or doctor.

Do not give anything by mouth to an unconscious person.

IF INHALED

Move person to fresh air.

If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.

Call a poison control center or doctor for further treatment advice.

IF ON SKIN OR CLOTHING

Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15 to 20 minutes.

Call a poison control center or doctor for treatment advice.

IF IN EYES

Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.

Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

You may also contact 1-877-325-1840 for emergency medical treatment information.

NOTE TO PHYSICIAN

No specific antidote is available. Treat symptomatically.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING

May be fatal if swallowed. Do not breathe dust or vapor. Do not get in eyes, on skin or on clothing. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco products.

Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

NET CONTENTS:

NUFARM INC.
BURR RIDGE, IL 60527

ACCEPTED
with COMMENTS
In EPA Letter Dated:

APR 20 2006

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.**

71-268-61

This product is toxic to aquatic invertebrates. Keep out of lakes, streams, or ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public water unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is for manufacturing use only and is intended for formulation into end use products for:

Terrestrial Non-food Crop, or Residential and Commercial Outdoor: Lawns, turfgrasses, ornamentals;

Terrestrial Food Crop: Apple, Banana, Barley, Blueberry, Bushberry, Canola, Citrus, Cotton, Cranberry, Cucurbit Vegetables, Grape, Greenhouse Vegetables, Fruiting Vegetables, Head and Stem Brassica Vegetables, Leafy vegetables, Leafy Petiole vegetables, Legume vegetables, Hop, Pecan, Pome fruit, Potato, ~~French~~ garden beet, ~~Roots and Taps~~, Root vegetables, edible seed crops for Sorghum, Sugarbeet, Strawberry, Stone Fruit, Sunflower, Tropical Fruit, Tuberous and Corn Vegetables, and Wheat.

Greenhouse Non-food Crop or Residential and Commercial Indoor: Ornamentals

All other uses for which the USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration. Uses for experimental purposes that are in compliance with EPA requirements.

Detailed information on chemical and physical properties and other formulating recommendations for this product are available upon request from Nufarm Americas Inc. Obtain and read this information before undertaking the formulation of Imidacloprid Technical in order to avoid formulation hazards and insure a satisfactory finished product.

Labeling for products formulated from this product must conform to that which is currently registered with the U.S. Environmental Protection Agency. For specific information on federally registered uses, contact Nufarm Americas Inc.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Handle and open container in a manner as to prevent spillage. If the container is leaking or material is spilled for any reason or cause, carefully sweep material into a pile and dispose of as directed for pesticides below.

Refer to Precautionary Statements on label for hazards associated with the handling of this material. In spill or leak incidents, keep unauthorized people away. You may contact Chemtrec (800) 424-9300.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Do not use container in connection with food, feed, or drinking water. Completely empty container into the processing equipment. Then dispose of empty container in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300
For Medical Emergencies Only, Call (877) 325-1840

WARRANTY STATEMENT

NUFARM INC. warrants that the product conforms to the chemical description on the label and is reasonably fit for the purposes set forth on the label when used according to directions under normal use conditions. THERE ARE NO OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING A WARRANTY OF FITNESS FOR A PARTICULAR PURPOSE. This warranty does not extend to the handling or use of this product contrary to label instructions or under abnormal conditions or under conditions not reasonably foreseeable to seller and buyer assumes all risk of any such use.

Prepared by GLM
(RV110105)



Nufarm Americas, Inc.
 George Meindl
 Registration Manager
 1333 Burr Ridge Parkway, Suite 125A
 Burr Ridge, IL 60527
 Phone: 708.755-7277 Fax 708.754.0314
george.meindl@us.nufarm.com

December 5, 2005

Via Overnight Courier

Dan Kenny (PM-1)
 Document Processing Desk (REGFEE)
 Office of Pesticide Programs (7504C)
 U. S. Environmental Protection Agency
 Room 266A, Crystal Mall 2
 1801 Bell Street
 Arlington, VA 22202-4501

Subject: Imidacloprid Technical
 EPA Reg. No. 71368-
 Application for New Product Registration
 Non - Fast track request (R31)

Dear Mr. Kenny:

Nufarm Inc. is interested in registering the subject product. Under the Pesticide Registration Improvement Act of 2003, it is our opinion that this action falls under category R31 86, new product non-fast track. We believe this is the appropriate category since this application is for a new source of an existing technical (active ingredient Imidacloprid) using a "cite-all" method. Therefore, Nufarm anticipates this action requires a fee of \$ 4,200 with a six -month review time at the Agency.

To process this request please find attached the transmittal document listing the administrative material and all submitted studies needed to support this registration request. In addition, within the next 2 weeks Nufarm will be submitting complete end use registration packages using this technical source.

If you should have any questions regarding this matter, feel free to contact me at 708.755.7277 or email at george.meindl@us.nufarm.com.

Sincerely,

George Meindl
 Registration Manager
 Nufarm Inc.



Nufarm Americas, Inc.
George Meindl
Registration Manager
1333 Burr Ridge Parkway, Suite 125A
Burr Ridge, IL 60527
Phone: 708.755.7277 Fax: 708.754.0314
george.meindl@us.nufarm.com

TRANSMITTAL DOCUMENT

1. Name and Address of Submitter

Nufarm Inc.
1333 Burr Ridge Parkway Suite 125A
Burr Ridge, IL 60527

2. Regulatory Action in Support of Which This Package is Submitted

Application for Pesticide Registration
Imidacloprid Technical
EPA File Symbol 71368-
PRIA category R31 86
New Product/Non-fast track
New Source of an existing active ingredient using "Cite all" method

3. Date of this Submission

December 5, 2005

4. List of Submitted Studies

Volume 1 Administrative Documents

PRIA letter
Application for Pesticide Registration (EPA form 8570-1)
Confidential Statement of Formula (EPA form 8570-4)
Certification with Respect to Citation of Data (EPA form 8570-34)
Data Matrix (EPA form 8570-35) both public and EPA versions
Proposed draft labels (5 copies)

Volume 2 (3 copies of all studies)

48707601 Product Chemistry (Guidelines 830.1550 - 1670)

48707802 Product Chemistry (Guidelines 830.1750 - 1800)

Product Chemistry (Guidelines 830.1700)

Reject (03)



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Volume 3
(3 copies of all studies)

- Reject (04) ☒ Color (Guideline 830.6302)
☒ Physical state (Guideline 830.6303)
☒ Odor (Guideline 830.6304)

Reject (05) Stability to normal and elevated temperature, metals and metal ions (Guideline 830.6313)

Reject (06) Oxidation/Reduction: chemical incompatibility (Guideline 830.6314)

Reject (07) pH (Guideline 830.7000)

46707608 UV/Visible Absorption (Guideline 830.7050)

Reject (08) Melting Point (Guideline 830.7200)

Reject (10) Density/Relative Density/Bulk Density (Guideline 830.7300)

46707611 Partition Coefficient (n-octanol/water), Shake Flask Method (Guideline 830.7550)

Reject (12) Water Solubility, Shake Flask Method (Guideline 830.7840)

46707613 Solubility of imidacloprid Tech 98% in organic solvents.

Company Official: George Meindl

Signature: 

Company Name: Nufarm Inc.

Company Contact: George Meindl
Registration Manager

Phone: 708.755.7277



George.Meindl@us.nufarm.
com

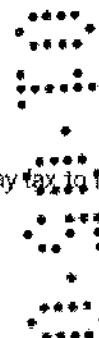
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To BettyR Williams/DC/USEPA/US@EPA

cc

bcc

Subject corrected pages to various reports from today fax to me



Hi Betty,









Here are the corrected pages for all the reports mentioned in your fax to me today. Please replace the attached with what was originally submitted for each study listed. Let me know if this is satisfactory to you.

(See attached file: rejected study 03 report no.4337.pdf) (See attached file: rejected study 04 report no.4290.pdf) (See attached file: rejected study 05 report no.4288.pdf) (See attached file: rejected study 06 report no.4283.pdf) (See attached file: rejected study 07 report no.4292.pdf) (See attached file: rejected study 09 report no.4282.pdf) (See attached file: rejected study 10 report no.4278.pdf) (See attached file: rejected study 12 report no.4285.pdf)

Thank you for all your help!

George Meindl
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 rejected study 03 report no.4337.pdf  rejected study 04 report no.4290.pdf  rejected study 05 report no.4288.pdf
 rejected study 06 report no.4283.pdf  rejected study 07 report no.4292.pdf  rejected study 09 report no.4282.pdf
 rejected study 10 report no.4278.pdf  rejected study 12 report no.4285.pdf

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